



# SAN JOAQUIN FARM BUREAU FEDERATION

MEETING TODAY'S CHALLENGES / PLANNING FOR TOMORROW

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May 5, 2008

Karen Scarborough  
Chair, BDCP Committee  
C/O Paul A. Marshall  
South Delta Improvements Program  
Bay-Delta Office  
California Department of Water Resources  
1416 Ninth Street  
Sacramento, CA 95814

RE: Bay Delta Conservation Plan

Dear Ms. Scarborough:

We would like to comment on the Bay Delta Conservation Planning process as an interested party in the Delta. The Farm Bureau represents 5,000 farming families, many of who rely on the Delta for their livelihood. We recognize that you are looking at various ways to protect species; however we feel you are not fully exploring all of the options available to make a comprehensive decision that would protect species, water exports, and most importantly in Delta water users.

The San Joaquin Farm Bureau Federation is concerned about the process by which the future management of California's water is being decided. The BDCP is deciding how the Central Valley's water will be managed, and how water will be conveyed in and upstream of the Delta. On March 24, the Department of Water Resources, DWR, held a meeting to initiate an EIR/EIS scoping process preparatory to implementing the as yet not publicly defined water management plan proposed by the BDCP. It was clear at that meeting that the intent is to expedite implementation of that Plan without any serious consideration of any other plan, and without first analyzing and making public a determination of the physical feasibility of implementing the BDCP plan, or the probable unintended consequences of the plan.

In other words the State Administration through the DWR has delegated to an unelected and unaccountable group the responsibility for determining the future of the Delta and of the State's water supply. The BDCP has been exercising this responsibility through a process that is not subjected to public or independent technical scrutiny, and that can commit the State to a very expensive, irreversible course of action that could prove to be a disaster for all water interests in and beyond the Central Valley, including the Delta with its fresh water fishery, its recreation, its water and land uses, etc. There are features of that plan that could result over time in conversion of the Delta to an open salt-water bay.

The BDCP should provide credibility to its process by doing the following:

- The BDCP should make public an analysis of how we got into a situation where we can neither protect the Delta nor provide an adequate developed water supply, and should explain how the BDCP proposal will address these causal factors. The population has already outgrown the developed water supply, and the inadequacy of the water supply is

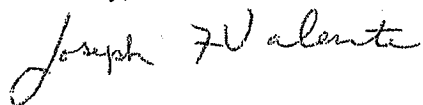
increasing as the population grows by about five million people every ten years. This growing inadequacy has resulted in almost eliminating the fresh water inflow to the Delta from the Mokelumne, Calaveras, and San Joaquin Rivers except during wet years.

- The BDCP should obtain and make public a competent, independent analysis of the salinity that would occur under its plan during months and years of low river flow in Delta channels south of the Sacramento channel.
- The BDCP should reveal what lands would be converted from agriculture to marshes or open water by its plan either overtly or because increases in salinity causes farming to be economically infeasible. The latter should be determined by qualified agricultural advisors rather than by economists.
- When farmers can no longer be the primary maintainers of non-urban levees will the BDCP proposal provide levee maintenance by some other designated entity, or will those levees be abandoned so that the Delta channel system converts to an open water bay?
- The BDCP should acknowledge that no change in Delta water conveyance can by itself increase the overall inadequate developed water supply and can therefore not solve the Delta protection versus water supply problem. The BDCP should explain how its proposal will address that problem or whether a canal would only serve to increase exports by trashing the Delta. In other words, are claims that the plan will protect the Delta while operating a canal, fraudulent claims?
- The BDCP and the DWR should revise the EIR/EIS and its scoping process so that the process is intended to determine the most effective method to protect the Delta while maximizing the average annual availability of water for export that is compatible with protection of the Delta. The process should give full consideration to a much improved through Delta plan without a canal. Specifically, the BDCP and the EIR/EIS process should consider the South and Central Delta's Comprehensive Management Plan on an equal footing with the BDCP proposal.

Ongoing processes are looking at the future of the Delta. It is imperative that we consider a through Delta approach to conveyance. Should a peripheral canal be constructed, the region will face significant devastation of increased flooding due to a barrier to the natural outflow of runoff. Residents and agriculture alike will be adversely impacted. Delta water quality must be maintained in order for species and farming to survive.

You must consider all of the options available and make a decision based on sound peer-reviewed. We encourage you to take a step back and look at real solutions, not solutions meant to serve other ongoing processes.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joseph Valente". The signature is fluid and cursive, with the first name "Joseph" written in a larger, more prominent script than the last name "Valente".

Joe Valente  
President